

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY

Caption in Compliance with D.N.J. LBR 9004-2(c)

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Attorney for Debtor
RM-1141

In Re:

Betina C. Finch

Case No. 12-37273CMG

Judge: Christine M Gravelle

Chapter 13

CHAPTER 13 DEBTOR'S CERTIFICATION IN OPPOSITION TO

X CREDITOR'S MOTION or CERTIFICATION OF DEFAULT

TRUSTEE'S MOTION or CERTIFICATION OF DEFAULT

The debtor in the above-captioned chapter 13 proceeding hereby objects to the following **(choose one)**:

1. X Motion for Relief from the Automatic Stay filed by Rushmore Loan Management Services, creditor. A hearing has been scheduled for September 21, 2016, at 9:00 a.m.

OR

 Motion to Dismiss filed by the Standing Chapter 13 Trustee. A hearing has been scheduled for at a.m.

OR

 Certification of Default filed by , creditor. I am requesting that a hearing be scheduled on this matter.

OR

 Certification of Default filed by Standing Chapter 13 Trustee. I am requesting that a hearing be scheduled on this matter.

2. I am objecting to the above for the following reasons (**choose one**):

_____ Payments have been made in the amount of \$_____, but have not been accounted for. Documentation in support is attached hereto.

OR

_____ Payments have not been made for the following reasons and debtor proposes repayment as follows (**explain your answer**):

OR

X Other: I received a trial loan modification for my mortgage from Rushmore Loan Management Services. I have completed all trial payments and I am currently waiting for the loan modification approval. I respectfully request the court deny the movant's request for relief & allow me to continue my Chapter 13 Plan.

3. This certification is being made in an effort to resolve the issues raised by the creditor in its motion.
4. I certify under penalty of perjury that the foregoing is true and correct.

Date: 9/8/2016

/s/ Betina C. Finch
Betina C. Finch, Debtor